



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue  
Seattle, WA 98101

March 3, 2005

Reply To

Attn Of: ETPA-088

Ref: 97-013-BLM

Henri Bisson, State Director  
U.S. Department of the Interior  
Bureau of Land Management  
Alaska State Office  
222 W. 7th Avenue, #13  
Anchorage, AK 99513-7599

Dear Mr. Bisson:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Amended Integrated Activity Plan/Environmental Impact Statement (Final EIS) for the **Northeast National Petroleum Reserve-Alaska (NE NPR-A)** (CEQ No. 050027) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

In our September 9, 2004 comment letter on the draft EIS, we assigned an EO-2 (Environmental Objections - Insufficient Information) rating to the Preferred Alternative. In our letter, we concluded that the Preferred Alternative is likely to cause significant adverse impacts to fish and wildlife resources and habitat areas (including wetlands and aquatic habitat). Specifically, EPA raised the following objections in our comments on the Draft EIS: (1) lack of information that shows the necessity of leasing sensitive environmental areas including wetlands in order to meet Purpose and Need, (2) adoption of unproven performance-based mitigation measures in lieu of No Surface Activity restrictions, and (3) lack of meaningful engagement with Tribes and residents in affected communities. The Final EIS does not address these objections.

The new proposed Preferred Alternative identified in the Final EIS includes a management plan that opens up the critical habitat areas discussed above to leasing, and subsequently to oil and gas exploration, development, and production. This alternative presents additional environmental risks over the Preferred Alternative proposed in the Draft EIS.

The rationale in the Final EIS does not support the choice of the new proposed Preferred Alternative, which relies upon experimental and unproven stipulations and ROPs (Recommended Operating Procedures) as performance-based mitigation measures. Mitigation measures and management techniques should have a proven track record before we rely on them to protect the environmentally sensitive areas north of Teshekpuk Lake. The potential for impacts could be significantly reduced by gradually phasing in the leases in environmentally sensitive areas after the effectiveness of stipulations and ROPs have been demonstrated in less sensitive areas.

In recognition of the commitment in the Final EIS to prepare additional NEPA documents, EPA believes that EISs are appropriate for future development of the leases. Subsequent EISs are the appropriate tool to evaluate the performance of the stipulations and ROPs and their ability to protect sensitive environmental areas. Due to potential environmental impacts summarized above we support the need identified in the Final EIS for an adaptive management program. This program could be implemented through the EIS development, which would involve concerned stakeholders. We would welcome the opportunity to meet with you and discuss these recommendations. Please contact me at (206) 553-1272 if you have comments or questions.

Sincerely,

/S/

Michelle Pirzadeh, Director  
Office of Ecosystems, Tribal and Public Affairs